STATE OF INDIANA ) ) SS:	IN THE MARION SUPERIOR COURT
COUNTY OF MARION	CAUSE NO. 49D02-0706-PL-02334
STATE OF INDIANA,	)
Plaintiff,	FILED
Vs.	MAY 0 9 2008
MEHRAN VALIYI,	) INDIAN COUNTY SHEETING
Defendant.	)

## AGREED ORDER FOR PERMANENT INJUNCTION

Plaintiff, State of Indiana, by counsel, Attorney General Steve Carter and Deputy Attorney General Joseph V. Basile, and Defendant Mehran Valiyi, by counsel, Bruce D. Brattain, stipulate and consent to the entry of this Agreed Order for Permanent Injunction ("Agreed Order"). The parties consent to the entry of this Agreed Order without the taking of proof and without it constituting evidence or an admission by Defendant regarding any issue of fact alleged in the Complaint, and without Defendant admitting any liability. The parties agree that:

- 1. This Court has jurisdiction over the subject matter of, and the parties to, this civil action.
- 2. The injunctive provisions of this Agreed Order apply to Defendant and to his agents, assigns, employees, and representatives; to all persons acting by, through, under, or on behalf of Defendant; and to all persons acting in concert with or participating with Defendant whom have actual or constructive knowledge of this Agreed Order.

- 3. Defendant is permanently enjoined and restrained from:
- (a) contriving, preparing, setting up, operating, publicizing by means of advertisements or promoting a pyramid promotional scheme; and
- (b) violating any other provision of Indiana's Deceptive Consumer Sales Act, currently codified at Ind. Code §24-5-0.5-1-12.
- 4. This Court retains jurisdiction over this matter for the purpose of enabling any party to this Agreed Order to apply to the Court at any time for such further orders and directions as may be necessary and appropriate for the construction or carrying out of this Agreed Order, for the modification of any of the injunctive provisions of it, for the enforcement of compliance with it, or for the punishment of violations of it. Plaintiff, at its sole discretion, may seek enforce, to obtain an order construing, or to punish violations of this Agreed Order or any of its provisions in any other court of competent jurisdiction.
- 5. Defendant enters into this Agreed Order knowingly and voluntarily.
- 6. There is no just reason for delay and the clerk should enter this Agreed Order immediately.
- 7. This Agreed Order shall take effect immediately upon its entry.
- 8. The remainder of Plaintiff's Complaint is dismissed, costs paid.

All of which is Ordered this day of , 2008

JUDGE, MARION SUPERIOR COURT

## AGREED TO:

STATE OF INDIANA, Plaintiff Attorney General Steve Carter MEHRAN VALIYI, Defendant

By Joseph V Basile, #23302-49

Date: 51208

Mehran Valiyi

Date: 4-28-08

APPROVED AS TO FORM:

BRATTAIN & MINNIX

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Attorneys for Defendant

## DISTRIBUTION:

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